

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Application of Thresher	)	Docket No. 26-CONS-3037-CEXC
Energy, Inc. for an exception to the 10-year time	)	
limitation of K.A.R. 82-3-111 for its J. T. Miller 1	)	CONSERVATION DIVISION
well located in the SW SW NW NW of Section 28,	)	
Township 30 South, Range 3 East, Cowley County,	)	License No. 35820
Kansas	)	

NOTICE OF PROTEST

COME NOW, the following persons:

Keith Call and Cindy Call,  
husband and wife  
3123 42<sup>nd</sup> Road  
Udall, Kansas 67146

(hereinafter, "Protesters"), and for their Protest of the Application of Thresher Energy, Inc.  
("Applicant") in the captioned docket, state as follows:

1. Protesters are owners of all surface rights and a fractional undivided interest in and to the mineral rights associated with the Northwest Quarter (NW/4) of Section 28, Township 30 South, Range 3 East, Cowley County, Kansas upon which the J. T. Miller 1 well subject to this Application is located, and therefore have a direct and substantial interest in this proceeding.
2. Pursuant to K.A.R. 82-3-100, Applicant requests an exception to the 10 year limit on temporary abandonment for its J. T. Miller 1 well prescribed by K.A.R. 82-3-111(b) to allow the well to remain shut-in so it can be evaluated for recompletion as a producer or converted to a disposal well.

3. According to records maintained by the Kansas Geological Survey, the J. T. Miller 1 well was drilled and completed as an oil well in February 2010, but has only produced 10,090 barrels of oil since that time, and has produced no oil during the preceding 10 years, since July, 2015. Protesters have experienced uncompensated damage to the surface of their land, and believe that the oil and gas lease pursuant to which the well was drilled has now expired in the absence of production. Continued temporary abandonment of the subject well will cause additional waste, possibly violate Protesters' correlative rights, and pollute the fresh water resources associated with Protesters' land.

WHEREFORE, Protesters request that the Commission accept their Protest, deny the Application herein, or in the alternative, set the Application for hearing, permit Protesters to present evidence in opposition to the Application, and grant to Protesters such other and further relief as the Commission may deem just and proper.

Respectfully submitted,

/s/Thomas M. Rhoads

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Attorney for Protesters

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 12<sup>th</sup> day of August, 2025 he caused the above and foregoing Notice of Protest to be filed with the Kansas Corporation Commission, Conservation Division electronically, and a copy thereof to be served by first class United States Mail, postage prepaid, upon the Applicant at the address shown:

Thresher Energy Inc.  
2 Northpoint Drive, Suite 800  
Houston, Texas 77060

/s/Thomas M. Rhoads  
Thomas M. Rhoads